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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PERIENNE DE JARAY,
Plaintiff,

No.: 2:16-cv-00571

v.

ATTORNEY GENERAL OF CANADA
FOR HER MAJESTY THE QUEEN,
CANADIAN BORDER SERVICES
AGENCY, GLOBAL AFFAIRS CANADA
fka DEPARTMENT OF FOREIGN
AFFAIRS AND INTERNATIONAL
TRADE CANADA, GEORGE WEBB,
KEVIN VARGA, and PATRICK LISKA,
Defendants.

SECOND DECLARATION OF
JANIS C. PURACAL IN SUPPORT OF
PLAINTIFF'S MOTION FOR FRCP 16
STATUS CONFERENCE AND
PERMISSION TO ENGAGE IN
DISCOVERY UNDER FRCP 26(f)

I, Janis C. Puracal, declare as follows:

1. I am an attorney with the law firm of Maloney Lauersdorf Reiner, PC, counsel to Plaintiff Perienne de Jaray in this matter. I have personal knowledge of the following facts based on my capacity as counsel in this case.

2. The exhibits numbers in this declaration begin where my earlier declaration (Dkt. No. 16) left off.

3. Attached as Exhibit 2 is a true and correct copy of an email thread between counsel in this case, ending on August 12, 2016.

4. Attached as Exhibit 3 is a true and correct copy of an email thread between counsel in this case, ending on July 28, 2016.

5. Attached as Exhibit 4 is a true and correct copy of Plaintiff's original draft stipulation on service and an extension to answer.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated this 19th day of August, 2016.

/s/Janis C. Puracal

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Attorneys for Plaintiff Perienne de Jaray